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Countrywide Financial Corp.,
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Countrywide Capital Markets, LLC,
Countrywide Home Loans, Inc.,
Countrywide Home Loans Servicing LP,
CWMBBS, Inc., CWALT, Inc., CWABS,
Inc., and CWHEQ, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

IN re COUNTRYWIDE FINANCIAL
CORP. MORTGAGE-BACKED
SECURITIES LITIGATION CASES

Case No. 11-ML-02265-MRP (MANx)

**STIPULATION REGARDING
MODIFICATION OF PAGE LIMITS
FOR MOTION TO DISMISS
BRIEFING**

Courtroom: 12
Judge: Hon. Mariana R. Pfaelzer

THRIVENT FINANCIAL FOR
LUTHERANS, *et al.*,
Plaintiffs,

v.

COUNTRYWIDE FINANCIAL
CORPORATION, *et al.*,
Defendants.

Case No. 11-07154-MRP-MAN

1 WHEREAS, on April 27, 2011, Plaintiffs Thrivent Financial for Lutherans,
2 Thrivent Life Insurance Company, Thrivent Balanced Fund, Thrivent Core Bond
3 Fund, Thrivent Income Fund, Thrivent Limited Maturity Bondfund, Thrivent
4 Balanced Portfolio, Thrivent Bond Index Portfolio, Thrivent Limited Maturity
5 Bond Portfolio, Thrivent Financial Defined Benefits Plan Trust, and Thrivent
6 Financial For Lutherans Foundation (“Plaintiffs”) filed the their complaint (the
7 “Complaint”) in this action;

8 WHEREAS, on August 2, 2011, Defendants Countrywide Financial Corp.,
9 Countrywide Securities Corp., Countrywide Capital Markets, LLC, Countrywide
10 Home Loans, Inc., Countrywide Home Loans Servicing LP, CWMBS, Inc.,
11 CWALT, Inc., CWABS, Inc., and CWHEQ, Inc., Bank of America Corp., NB
12 Holdings Corporation, and BAC Home Loans Servicing, L.P., Angelo Mozilo and
13 David Sambol (collectively, “Defendants”) filed four separate motions to dismiss
14 the Complaint;

15 WHEREAS, pursuant to the Court’s order of October 25, 2011, the
16 Countrywide Defendants and the Bank of America Defendants filed supplemental
17 briefs in support of their respective motions to dismiss the Complaint on
18 November 4, 2011;

19 WHEREAS, Defendants’ opening and supplemental briefs in support of
20 their respective motions to dismiss the Complaint collectively total 120 pages;

21 WHEREAS, on or before December 15, 2011, Plaintiffs will file an omnibus
22 memorandum in opposition to Defendants’ motions to dismiss the Complaint;

23 WHEREAS, on or before January 12, 2012, Defendants will file reply
24 memoranda in support of their respective motions to dismiss the Complaint; and

25 WHEREAS, the parties hereto agree that justification and good cause exists
26 for modifying the 25-page limitation for the parties’ respective opposition and
27 reply briefs;

1 NOW, THEREFORE, the parties hereby agree and stipulate to the
2 following, subject to the Court's approval:

3 1. Plaintiffs shall file a memorandum in opposition to the motions to
4 dismiss the complaint not to exceed 120 pages in length.

5 2. Defendants shall collectively file reply memoranda in support of
6 respective motions to dismiss the complaint not to exceed 80 pages in length.

7 IT IS SO STIPULATED.

8
9 Dated: November 21, 2011

Defendants Countrywide Financial Corp.,
Countrywide Home Loans,
Inc., Countrywide Home Loan Servicing,
L.P., Countrywide Capital Markets, LLC,
Countrywide Securities Corp., CWALT,
Inc.; CWABS, Inc., CWHEQ, Inc., and
CWMBS, Inc.,

13 /s/ Brian E. Pastuszewski

14 Brian E. Pastuszewski (*pro hac vice*)
15 Lloyd Winawer (State Bar No. 157823)
16 Inez H. Friedman-Boyce (*pro hac vice*)
17 Brian C. Devine (State Bar No. 222240)
18 Daniel P. Roeser (*pro hac pending*)

19
20 Dated: November 21, 2011

Defendants Bank of America Corp., NB
Holdings Corporation, and BAC Home
Loans Servicing, L.P.

21 By their attorneys,

22 /s/ Matthew Close

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Defendant Angelo Mozilo

3 By his attorney,

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14 /s/ Michael C. Tu

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1 Dated: November 21, 2011

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3 Thrivent Life Insurance Company, Thrivent
4 Balanced Fund, Thrivent Core Bond Fund,
5 Thrivent Income Fund, Thrivent Limited
6 Maturity Bondfund, Thrivent Balanced
7 Portfolio, Thrivent Bond Index Portfolio,
8 Thrivent Limited Maturity Bond Portfolio,
9 Thrivent Financial Defined Benefits Plan
10 Trust, and Thrivent Financial For Lutherans
11 Foundation

12 By their attorneys,

13 /s/ Timothy DeLange

14 Timothy DeLange

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PROOF OF SERVICE

I, Arianne M. Waldron, declare:

I am employed in Los Angeles, California. I am over the age of 18 and not a party to the within action. My business address is 601 S. Figueroa St., 41st Floor, Los Angeles, CA 90017.

On **November 21, 2011**, I served the following document by placing a true copy thereof in a sealed envelope(s) on the persons listed on the service list:

STIPULATION REGARDING MODIFICATION OF PAGE LIMITS FOR MOTION TO DISMISS BRIEFING; and

[PROPOSED] ORDER ON STIPULATION REGARDING MODIFICATION OF PAGE LIMITS FOR MOTION TO DISMISS BRIEFING

☐ (MAIL) I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

☐ (OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

☐ (MESSENGER SERVICE) I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed and provided them to a professional messenger service for service. A separate Personal Proof of Service provided by the professional messenger service will be filed under separate cover.

☐ (FACSIMILE) Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

☐ (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

1 ☒ (CM/ECF Electronic Filing) I caused the above document(s) to be
2 transmitted to the office(s) of the addressee(s) listed above by electronic
3 mail at the e-mail address(es) set forth above pursuant to
4 Fed.R.Civ.P.5(d)(1). "A Notice of Electronic Filing (NEF) is generated
5 automatically by the ECF system upon completion of an electronic filing.
The NEF, when e-mailed to the e-mail address of record in the case, shall
constitute the proof of service as required by Fed.R.Civ.P.5(d)(1). A copy of
the NEF shall be attached to any document served in the traditional manner
upon any party appearing pro se."

6 I declare under penalty of perjury that I am employed in the office of a
7 member of the bar of this Court at whose direction this service was made and that
the foregoing is true and correct.

8 Executed on **November 21, 2011**, at Los Angeles, California.

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10 Arianne M. Waldron
11 (Type or print name)

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(Signature)

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